

1991

# Broadbent Land Co. v. Town of Manila and Daggett County : Unknown

Utah Supreme Court

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Unknown.

Unknown.

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**MOUNTAIN FUEL**

A QUESTAR COMPANY

180 EAST FIRST SOUTH STREET ■ SALT LAKE CITY, UTAH 84111

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DOCKET NO.

BRIEF

910262CV-324B

**FILED**

**AUG 25 1992**

**CLERK SUPREME COURT,  
UTAH**

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August 24, 1992

Geoffrey J. Butler, Clerk  
Utah Supreme Court  
532 State Capitol  
Salt Lake City, Utah 84114

*Re: Broadbent Land Co. v. Town of Manilla &  
Daggett County; No. 910262CV-324B*

Dear Mr. Butler:

Pursuant to Rule 24(j) of the Utah Rules of Appellate Procedure, Mountain Fuel Supply Company, ("Mountain Fuel"), an amicus curiae in these proceedings, through its counsel of record, responds to the letter from Kristin G. Brewer to Geoffrey J. Butler, August 20, 1992. Ms. Brewer requests the addition of three cases as support for currently unsupported statements contained at page 10 of appellant's brief and page 19<sup>1</sup> of its reply brief.

The reason for the request is that "two of them reflect the United States Supreme Court's views" and "Hendler . . . is also relevant".

Mountain Fuel objects to the inclusion of this authority since it deals with takings of private property for public use and not "takings" in the public domain which may affect private use. Thus, the cases are not relevant nor supportive of appellant's statements.

I have enclosed nine copies of this letter. Thank you for your consideration

Very truly yours,

*Robert H. Lovell*

RHL:dr  
Enclosures

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<sup>1</sup>Page 19 contains statements characterizing appellee's and amicus curiae's briefs. Possibly page 20 was intended.

Geoffrey J. Butler, Clerk

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August 24, 1992

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